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**MEMO ENDORSED**

September 26, 2022

Honorable Katherine Polk Failla  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2103  
New York, NY 10007

Re: *Iowa Pub. Emps.' Ret. Sys. et al. v. Bank of Am. Corp. et al.*, No. 17-cv-  
6221 (KPF) (SLC)

Dear Judge Failla:

Defendants respectfully request leave to file under interim seal their Response to Plaintiffs' Limited Objection to Part IV.D of Magistrate Judge Cave's Report and Recommendation, and to file a motion to seal along with proposed redacted and highlighted copies by October 14, 2022.

Your Honor previously ordered the parties to follow this procedure for the sealing and redaction of previous briefing relating to Plaintiffs' class certification motion. (ECF No. 408 at 2.) Defendants' filing of their Objections to Judge Cave's Report and Recommendation was also made in accordance with this procedure. (ECF Nos. 575, 578; *see also* ECF Nos. 494, 497, 511, 512.) Defendants respectfully submit that the same procedure should apply to Defendants' Response, which contains references to materials designated as Highly Confidential or Confidential pursuant to the Protective Order in this case. (ECF No. 150.)

We have conferred with counsel for Plaintiffs, who consent to our request.

Respectfully,

/s/ Richard C. Pepperman II

Richard C. Pepperman II

*Attorney for Defendant Goldman Sachs &  
Co. LLC*

Application GRANTED. Defendants shall file their motion to seal along with proposed redacted and highlighted copies by October 14, 2022. The Court understands that the response will be viewable by the Court and parties only.

The Clerk of Court is directed to terminate the motion at docket entry 593.

Dated: September 27, 2022  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE